

LAW OFFICES  
**STILLMAN & FRIEDMAN, P.C.**  
 425 PARK AVENUE  
 NEW YORK, NY 10022  
 www.stilmanfriedman.com

USDS SDNY  
 DOCUMENT  
 ELECTRONICALLY FILED  
 DOC #:  
 DATE FILED: 7/10/12

CHARLES A. STILLMAN  
 JULIAN W. FRIEDMAN  
 SCOTT M. NIMES  
 MARJORIE J. PEECE  
 JOHN B. HARRIS  
 JAMES A. MITCHELL  
 MICHAEL J. GRUBBERG  
 NATHANIEL Z. MARMUR

TELEPHONE  
 (212) 223-0200  
 FACSIMILE  
 (212) 223-1942

MARY MARGULIS-CHNUMA

NATHANIEL I. KOLODNY  
 ELIZABETH S. WEINSTEIN  
 ERIK M. ZISSU  
 LAURA P. WEXLER

VIA FACSIMILE

July 9, 2012

**MEMO ENDORSED**

The Honorable Kimba M. Wood  
 United States District Court Judge  
 Southern District of New York  
 500 Pearl Street  
 New York, New York 10007

Re: United States v. Ghavami, et al., 10 Cr. <sup>1217</sup>~~42~~ (KMW)

Dear Judge Wood:

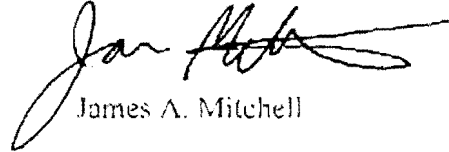
We write on behalf of counsel for all defendants in the above-referenced action. As we advised Your Honor at the conference this morning, tomorrow we will be filing and serving the defendants' memorandum of law and supporting declaration in opposition to the motion to quash the 17(c) subpoena issued to the firm Wilmer Cutler Pickering Hale and Dorr LLP. Attached to the supporting declaration are two documents: (1) a letter from the government dated March 18, 2012 describing certain information about the witness at issue in the subpoena; and (2) a FBI Form 302 from a July 12, 2011 interview of the same witness.

Given that we believe the information in those documents is subject to the protective order in this case, we would respectfully request that Your Honor "so order" this letter allowing us to provide those two documents to WilmerHale with our opposition papers on the condition that WilmerHale keep the documents and the information therein confidential. We have discussed this issue with WilmerHale and the government, and they are both agreeable to this resolution. Finally, we have agreed with the government that we will redact any information in the March 18, 2012 letter unrelated to the witness at issue.

LAW OFFICES  
STILLMAN & FRIEDMAN, P.C.

Thank you for your consideration of this request.

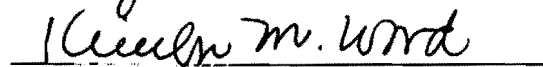
Respectfully submitted,

  
James A. Mitchell

JAM

cc: Counsel of Record (*by email*)  
David Olsky, Esq. (*by email*)

SO ORDERED:

*July 9, 2012*  
  
Honorable Kimba M. Wood